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FILED  
U.S. DISTRICT COURT

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DISTRICT OF UTAH

BY: DEPUTY CLERK

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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

TRACI L. REYNOLDS,

Defendant.

MISDEMEANOR  
INFORMATION

Vio: 29 U.S.C. § 439(b) (Falsification  
of Annual Financial Report Filed by  
Labor Union in the Private Sector)

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Case: 2:08cr00081  
Assigned To : Alba, Samuel  
Assign. Date : 2/5/2008  
Description: USA v. Reynolds

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The United States Attorney charges:

At all times material to this Misdemeanor Information International Brotherhood of Electrical Workers (IBEW) was a labor organization in an industry affecting interstate commerce within the meaning of 29 U.S.C. §§ 402(i) and (j).

Count 1

(Falsification of Annual Financial Report Filed by Labor Union in the Private Sector)

On or about February 1, 2004, in the Central Division of the District of Utah,

TRACI L. REYNOLDS,

the defendant herein, did make and cause to be made a false statement and representation of material fact knowing it to be false in a report and document required to be filed by IBEW with the Secretary of Labor pursuant to 29 U.S.C. § 431, to wit: she falsely misrepresented the amount of money she received each year from the local union on Form LM-2, all in violation of 29 U.S.C. § 439(b) and punishable by the same.

Count 2

(Falsification of Annual Financial Report Filed by Labor Union in the Private Sector)


On or about February 1, 2005, in the Central Division of the District of Utah,

TRACI L. REYNOLDS,

the defendant herein, did make and cause to be made a false statement and representation of material fact knowing it to be false in a report and document required to be filed by IBEW with the Secretary of Labor pursuant to 29 U.S.C. § 431, to wit: she falsely misrepresented the amount of money she received each year from the local union on Form LM-2, all in violation of 29 U.S.C. § 439(b) and punishable by the same.

DATED this 4<sup>th</sup> day of February, 2008.

BRETT L. TOLMAN  
UNITED STATES ATTORNEY

  
SCOTT ROMNEY  
Assistant United States Attorney